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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
- - -

DAVID BUSH AND : No. 07-4936
CHRISTOPHER BUSH :
vs. :
: S.C. ADAMS, LT., et al:
- - -

Thursday, January 7, 2010
- - -

Deposition of STEVEN J. IGNATZ,
taken pursuant to notice at the offices
of Attorney General, Norristown,
Pennsylvania, on the above date,
beginning at approximately 9:50 a.m.
before Barbara C. Stalheim, Certified
Shorthand Reporter and Notary Public.

BUCKS COUNTY COURT REPORTERS
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11 Philadelphia, Pennsylvania 19107
12 for the Defendants

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I N D E X

WITNESS

PAGE

STEVEN J. IGNATZ

By Mr. Puricelli

4

- - -

E X H I B I T S

NUMBER

MARKED

Ignatz-1

61

Ignatz-2

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78

Ignatz-4

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Ignatz-5

118

- - -

EXHIBITS ATTACHED TO ORIGINAL COPY OF
TRANSCRIPT ONLY

- - -

2

- - -

3

(It is hereby stipulated

4

and agreed by and between counsel for

5

the respective parties that signing,

6

sealing and certification are waived;

7

and that all objections, except as to

8

the form of the question, are reserved

9

to the time of trial.)

10

- - -

11

STEVEN J. IGNATZ, after

12

having been duly sworn, was examined as

13

follows:

14

- - -

15

P R O C E E D I N G S

16

- - -

17

BY MR. PURICELLI:

18

Q. All right. Lieutenant Ignatz,

19

forgive me if I pronounce your name. I'll

20

tell you right off the bat I tend to butcher

21

everybody's name, sometimes even my own. So

22

don't take it as an offense, please.

23

Okay. Am I close?

24

A. Ignatz.

25

Q. Ignatz.

1

STEVEN J. IGNATZ

2

Okay. Is there any other

3

name you prefer me to call you other than

4

Lieutenant Ignatz?

5

A. Whatever works for you is fine

6

with me.

7

Q. Well, sometimes I'll say sir

8

then.

9

I'm Brian Puricelli. I

10

represent the plaintiffs in this case. As

11

you are aware, I'm sure by now, you're a

12

named defendant in the case. Perhaps after

13

this deposition you won't be. We'll see.

14

Have you ever been deposed

15

before?

16

A. Yes.

17

Q. Okay. And have you been at least

18

become familiar with the instructions when we

19

say usual stipulations?

20

A. Yes. I believe so.

21

Q. Okay. I'm going to ask

22

questions. You're going to hopefully be able

23

to provide answers for them. The two

24

objections that control here are form of the

25

question. If that's raised we're going to

1

STEVEN J. IGNATZ

2 want to know if you understand the question.

3

And the other one is

4

privilege. So if I ask you an area which

5

your attorney believes is an area privileged

6

at law, meaning I can't ask questions in that

7

area and then we'll move on and allow the

8

judge to decide whether or not you do or

9

don't have to answer that question.

10

Okay. Aside from that

11

it's important that you answer all questions

12

orally. Up and down, sideways, motions of

13

the head although can be noted, they're

14

difficult for people reading the transcript

15

and it's also hard for the court reporter.

16

Second is to talk only one

17

at a time. I'm guilty of that myself, but it

18

helps the court reporter tremendously and

19

aids us, as well, by allowing us to have a

20

clean transcript.

21

Do you understand that?

22

A. Yes, sir.

23

Q. Okay. If I ask you a question,

24

whether it's because I use words that are

25

inappropriate or delay in my questioning,

1

STEVEN J. IGNATZ

2 which I sometimes do, please tell me you
3 don't understand the question. I will try to
4 rephrase it or explain it to you so that you
5 do understand it.

6

Is that okay?

7

A. Yes, sir.

8

Q. All right. If you don't
9 understand at all anything simply tell us.
10 Don't guess. Don't assume.

11

If you're going to
12 approximate something let us know you're
13 approximating something. Okay?

14

A. Will do.

15

Q. All right.

16

MR. PURICELLI: Anything
17 you want to instruct your witness?

18

MR. HENZES: No. That's
19 fine.

20

BY MR. PURICELLI:

21

Q. Okay. All right. Have you read
22 anything to prepare for today's deposition?

23

A. Yes.

24

Q. What did you read?

25

A. I just looked over previous

1

STEVEN J. IGNATZ

2 transcript from when we were -- when we met
3 previously.

4 Q. Okay. I'm going to show you an
5 October 24, 2008 transcript I have and let me
6 know whether or not this is what you say you
7 reviewed for today.

8 I think if you turn to 154
9 of that document you'll see your testimony.

10 MR. HENZES: There's 184.

11 We're almost getting there.

12 MR. PURICELLI: 154.

13 - - -

14 (Discussion held off the
15 record.)

16 - - -

17 THE WITNESS: Yes. This
18 is what I reviewed.

19 BY MR. PURICELLI:

20 Q. All right. So if I were to ask
21 you the same questions would the answers
22 today be the same?

23 A. Yes, sir.

24 Q. All right. There's nothing --
25 having reviewed it, there's nothing you want

1 STEVEN J. IGNATZ

2 to change in there.

3 Correct?

4 A. That's correct.

5 Q. All right.

6 MR. PURICELLI: So it's
7 all right we just adopt that testimony,
8 Randy?

9 MR. HENZES: If that's
10 what you want to do, that fine.

11 BY MR. PURICELLI:

12 Q. All right. Aside from reading
13 your transcript did you review any other
14 documentation?

15 A. No.

16 Q. Okay. Have you suffered any
17 mental or physical occurrences or taken any
18 types of medications, legal or otherwise,
19 that would impair your ability to recall
20 facts today?

21 A. No.

22 Q. Okay. And the transcript
23 indicates your history with the State Police.

24 Is that correct?

25 A. Yes.

1

STEVEN J. IGNATZ

2

Q. Okay. Aside from that history,

3

do you have any other law enforcement

4

history?

5

A. Yes.

6

Q. Okay. And what is that history?

7

A. From 1982 -- from January of 1982

8

until April 14 of 1985 I was a municipal

9

police officer.

10

Q. Where?

11

A. In Armstrong County for the

12

boroughs of Leechburg, that's

13

L-E-E-C-H-B-U-R-G, and Gilpin, G-I-L-P-I-N,

14

Township. I was a part-time officer for both

15

municipalities.

16

Q. Okay. I assume then that you

17

attended the State Police Training Academies

18

for municipal police officers back then?

19

A. I attended the Municipal Police

20

Training Academy sponsored by Indiana

21

University of Pennsylvania.

22

Q. Okay. And between '82 and '85

23

did you continue to have your updates?

24

A. Yes, sir.

25

Q. Okay. Aside from that have you